

**REMARKS**

The Office Action dated June 11, 2009, has been received and carefully noted. The above amendments and the following remarks are being submitted as a full and complete response thereto. Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

**Summary of the Office Action**

In the outstanding Office Action dated June 11, 2009, claims 1 and 2 were rejected under 35 U.S.C. § 102(b) as being anticipated by Sumitomo Electric Industries, Ltd., JP 8-165582 A (hereinafter, "Sumitomo").

**Summary Response to the Office Action**

Claim 1 has been amended to more particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. Claim 2 has been cancelled. Claims 3 and 4 stand withdrawn. New claims 5 and 6 have been added. Thus, claims 1, 5 and 6 are currently pending in the application and subject to examination. Because support for the amended and added claims is provided in the application as originally filed, see, for example, FIG. 1 and paragraphs [0025] – [0029], the Applicant respectfully submits that no new matter is presented herein. To the extent that the rejection(s) remain applicable to the claims currently pending, the Applicant hereby traverses the rejection as follows.

**Rejections Under 35 U.S.C. § 102(b)**

Claims 1 and 2 were rejected under 35 U.S.C. § 102(b) as being anticipated by Sumitomo. Claim 1 has been amended and claim 2 has been cancelled. The Applicant respectfully traverses the rejections, insofar as they apply to newly amended independent claim 1 and newly added claims 5 and 6, because Sumitomo fails to teach each and every feature of the claims.

Sumitomo does disclose a terminal material (title) that includes both a gold plated layer 3 and a chromium plated layer 2 (FIG. 1). However, Sumitomo fails to disclose at least the combination of claimed features including, among other things, dipping in a cleaning fluid to remove the deposited film.

Therefore, Sumitomo fails to teach or disclose at least the combination of features including: a component in a film forming equipment for forming a thin film on a substrate, the component having a matrix material and being subject to formation on a surface of the component, during thin film formation, of a deposited film comprising a film forming material, the component being taken out of the film forming equipment for dipping in a cleaning fluid to remove the deposited film, the component having: a first metal film layer electrochemically less noble than the matrix material in the cleaning liquid, thereby forming a local cell, when dipped in the cleaning liquid, between the matrix material and the first metal layer, the first metal film layer being formed on a surface of the matrix material through one of: thermal spraying, vapor depositing, sputtering, and laminating; and a second metal film layer formed on the surface of the first metal film layer, the second metal film layer being electrochemically more noble

than the matrix material in the cleaning liquid, thereby forming a local cell, when dipped in the cleaning liquid, between the first metal film layer, the second metal film layer being formed through one of: thermal spraying, vapor depositing, sputtering, and laminating, as claimed in claim 1.

Sumitomo also fails to disclose at least the combination of claimed features including, among other things, the means for forming the local cells claimed in claims 5 and 6. As stated in MPEP §2182:

Both before and after Donaldson, the application of a prior art reference to a means or step plus function limitation requires that the prior art element perform the identical function specified in the claim. However, if a prior art reference teaches identity of function to that specified in a claim, then under Donaldson an examiner carries the initial burden of proof for showing that the prior art structure or step is the same as or equivalent to the structure, material, or acts described in the specification which has been identified as corresponding to the claimed means or step plus function.

(emphasis added). Applicants respectfully submit that there is no disclosure or teaching in Sumitomo of a structure that “perform[s] the identical function” claimed in claims 5 and 6.

Therefore, Sumitomo fails to teach or disclose at least the combination of features including: a component in a film forming equipment for forming a thin film on a substrate, the component having: a matrix material; a means on said matrix material for forming a local cell, when exposed to a cleaning liquid, with the matrix material so that a local current flows from the matrix material thereby advancing dissolution of the means an interface between the means and the matrix material and allowing the removal of a film layer of the thin film from the matrix material., as claimed in claim 5. Similarly, Sumitomo fails to disclose the combination of features as claimed in claim 6.

**PRELIMINARY AMENDMENT UNDER 37 C.F.R. § 1.114**

U.S. Patent Application Serial No.: 10/538,856

Attorney Docket No.: 026390-00028

For at least these reasons, Sumitomo does not teach or suggest all of the features of newly amended independent claim 1 or newly added claims 5 and 6. Accordingly, Applicants respectfully request that the U.S.C. § 102(b) rejections of the Office Action of June 11, 2009 be withdrawn.

**PRELIMINARY AMENDMENT UNDER 37 C.F.R. § 1.114**

U.S. Patent Application Serial No.: 10/538,856

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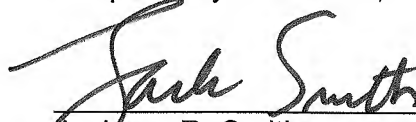
**Conclusion**

For all of the above reasons, it is respectfully submitted that the pending claims are in condition for allowance and a Notice of Allowability is earnestly solicited.

Should the Examiner determine that any further action is necessary to place this application into better form, the Examiner is invited to contact the undersigned representative at the telephone number listed below.

In the event this paper is not considered to be timely filed, the Applicants hereby petition for an appropriate extension of time. The Commissioner is hereby authorized to charge any fee deficiency or credit any overpayment associated with this communication to Deposit Account No. 01-2300 referencing client matter number 026390-00028.

Respectfully submitted,



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